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8 Attorneys for Plaintiffs

Virginia Pellegrini and

9 Virginia Pellegrini, Trustee of the

Mario and Virginia E. Pellegrini Trust

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11 UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA

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Virginia Pellegrini, Trustee of the Mario J.
and Virginia E. Pellegrini Trust, and
Virginia Pellegrini, and individual,

Case no. 07-CV-02497-CRB

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Plaintiff,

**NOTICE OF JOINT MOTION TO STAY
PROCEEDINGS**

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vs.

Hearing Date: July 25, 2008

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Time: 10:00 a.m.

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Court: Hon. Charles Brewer
Courtroom 8

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Technichem, Inc., a California corporation,
et al., et al.,

Trial date: October 6, 2008

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Defendants.

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To the parties and the Court:

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Please take notice that on July 25, 2008 at 10:00 a.m. in Courtroom 8 of the above Court, the

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Hon. Charles Brewer presiding, Virginia Pellegrini, individually and in her capacity as trustee, and
defendants Technichem, Inc. and affiliated defendants Mark J. Ng and Stephen S. Tung, who together
are all of the parties who have appeared in this case, will present their joint motion for an order staying

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NOTICE OF JOINT MOTION TO STAY PROCEEDINGS

Case no. 07-CV-02497-CRB

1 these proceedings pending litigation of substantially similar issues in a pending state court action.

2 The motion will be based on this notice, the memorandum of points and authorities and
3 declaration of Benjamin H. Ballard filed herewith, pertinent documents in the Court's file and other
4 evidence the Court might properly consider in connection with the motion.

5 Date: June 19, 2008

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7 Ballard Law Office
8 Lamphere Law Office

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10 By: _____
Benjamin H. Ballard

11 Attorneys for Plaintiffs

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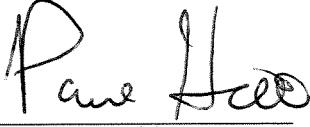
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Gordon & Rees LLP


By: _____
Paul A. Henreid

Attorneys for Defendants Technichem, Inc..
Mark J. Ng and Stephen S. Tung

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NOTICE OF JOINT MOTION TO STAY PROCEEDINGS

Case no. 07-CV-02497-CRB

1 **PROOF OF SERVICE**

2 I, Benjamin H. Ballard, hereby declare:

4 I am employed in the County of Marin, State of California; I am over the age of eighteen and not
5 a party to the within action; my business address is 1606 Juanita Lane, Ste. C, Tiburon CA 94920.

6 On the date listed below, I served the following document(s):

7 NOTICE OF MOTION IN TO STAY PROCEEDINGS, RELATED MEMORANDUM
8 OF POINTS AND AUTHORITIES, DECLARATION OF BENJAMIN H. BALLARD
9 AND PROPOSED ORDER

9 on all the parties in this action and/or the following persons at the addresses shown:

10 Brian M. Ledger
11 Paul A. Henreid
12 Gordon & Rees LLP
13 101 West Broadway
14 Suite 1600
15 San Diego, CA 92101
16 Attorneys for Defendants Technichem Inc.,
17 Mark J. Ng/ and Stephen S. Tung

18 x (e-filing) I electronically filed the documents with the United States District Court, Northern
19 District of California through CM/ECF (E-file).

20 (personal service): I caused envelopes addressed to them containing the documents to be
21 delivered by hand to them.

22 (overnight delivery) I caused envelopes addressed to them containing the documents to be
23 deposited at Tiburon, California with shipping charges prepaid for overnight delivery by
24 Federal Express or other, equivalent overnight delivery service.

25 (mail) I caused envelopes addressed to them to be deposited with postage prepaid in the
26 U.S. Mail at Tiburon, California.

27 (email) I emailed the documents to them at the email addresses shown.

28 (fax) I faxed the documents to them at the fax numbers shown

29 I declare under penalty of perjury under the laws of the State of California that the above is true
30 and correct. Executed on at Tiburon, California on June 19, 2008

31 /s/ Benjamin H. Ballard